



Letter Sent 7/62/01

July 2, 2001

Mr. Rodger Fain
Municipal Sanitation Utility
Wastewater Treatment Plant
1501 West Markland Avenue
Kokomo, IN. 46901

Dear Mr. Fain:

Enclosed is the semi-annual results that are required by our IWP permit.
Attached documents included are:

The Solvent Management Plan

The Accidental Spill Prevention Program (ASPP)

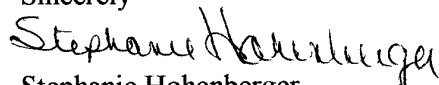
The TTO Certification Statement

The 40 CFR 433.10 categorical compliance statement

The Analytical Report

If you have any questions about the attached documents please feel free to contact me
at 452-5694.

Sincerely


Stephanie Hohenberger
Wastewater Operator

**MILBANK MANUFACTURING , CO.
KOKOMO FACILITY**

SOLVENT MANAGEMENT PLAN

**SPILL AND LEAK PREVENTION EQUIPMENT AND
PROCEDURES:**

EQUIPMENT:

- (1) Clay absorbent material is used for spill containment.
- (2) Primary raw material is used for spill containment.
- (3) *Drain "containment mat" for dock drain.

PROCEDURES:

In each department with stored hazardous chemicals, management and/or maintenance personnel visually inspect the storage areas for leaks prior to manufacturing operations.

Efforts are made to store chemicals in areas with minimal collision potential while maintaining good visibility.

General employees who handle small amounts of chemicals in their routine work are encouraged to practice good housekeeping. Employees who transport or store large containers of chemicals are instructed in spill prevention as part of their job training.

*There are no open floor drains to allow spills to go to the Kokomo Wastewater Treatment Plant.

EMERGENCY RESPONSE EQUIPMENT AND PROCEDURES:

Equipment (location)

1. Absorbent material (press room, die shop , crib and maintenance)
2. First aid equipment (first aid room)
3. Rubber gloves (die shop and maintenance)
4. Plastic drums for contaminated material storage (nearest trash drum with liner removed) and steel drums for combustible materials.
5. Splash aprons (die shop and maintenance)
6. Drain mat (dock)

Procedures:

Employees are instructed to notify their leadman or foreman immediately when they notice a spill or leak in their work area. The foreman inform maintenance and management personnel.

Maintenance and management personnel determine the severity of the spill or leak and necessary action required. Substantial spills or leaks are handled as follows: If necessary, employees are removed from the immediate area. If department or plant wide evacuation is necessary, employees follow the procedures outlined in the Emergency Action Plan.

Power is removed from any equipment affected by the spill or leak.

Maintenance personnel attempt to control the leak or spill using appropriate protective equipment. Small spills are contained by absorbent material or portable dams "absorbent tubes".

Spilled material that is not contaminated is collected for reuse when possible. Small spills of contaminated material are collected into plastic drums and pre-treated if necessary. Combustible materials are collected into steel drums. Combustible materials are typically not pre-treated.

Disposal of contaminated materials is in accordance with state and local regulations. Outside contractors are utilized when appropriate.

SPILL REPORTING AND SOLVENT MANAGEMENT PLAN MODIFICATION PROCEDURES

The Kokomo Wastewater Treatment Plant (WWTP) is contacted by telephone in the event of a major spill to the city sewage system or to the

outside plant premises. The Kokomo WWTP contact is currently Mitchell Smith at (765) 457-5509. The Solvent Management plan is reviewed by plant management and maintenance personnel when procedures are found to be inadequate or changes in plant operation warrant modification. Modifications are made with the approval of Corporate Management and changes sent to Kokomo WWTP.

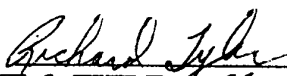
TRAINING PROCEDURES

General employees are encouraged to report spills immediately and follow good housekeeping practices. For safety purposes, they are generally not allowed to participate in major spill or lead containment efforts. For employees that work in chemical storage and transport, spill prevention guidelines are included in their job training when hired.

Employees are informed of the chemical hazards in their immediate work area through the procedures as outlined in the Hazard Communication Program.

CERTIFICATION

I certify that the information provided in this document is to the best of my knowledge true and that the solvent management plan is implemented as described.


NAME & TITLE *Plant Manager*

6-29-01

BRAND NAME (AND USE)	SOLVENT	LOCATION IN PLANT	MAX VOL. (GAL)	CONTAINER VOL. (TYPE)	DISPOSAL
UNISOL PLUS SOLVENT DEGREASER (CLEAN ELECTRICAL CONTACTS / MOTORS)	METHYLENE & PERCHLOROETHYLENE	MAINTENANCE STORAGE CAB.	2 GAL	1 GALLON (METAL CAN)	* PRODUCT USED IN SMALL AMOUNTS SMALL DRIPS EVAPORATE
CHEM SEARCH ND 165 (WATER SOLUABLE FLOOR DEGREASER)	ETHER	MAINTENANCE STORAGE CAB.	5 GAL	2 1/2 GALLON (PLASTIC CONTAINER)	* EVAPORATE
SAFETY KLEEN (DEGREASER TANK)	TOLUENE	DIE SHOP	60 GAL	SELF CONTAINED CABINET	* CABINET SERVICED AND PRODUCT DISPOSED OF BY SAFETY KLEEN

* THERE ARE NO OPEN FLOOR DRAINS TO ALLOW SPILLS TO GO TO THE KOKOMO WASTEWATER TREATMENT PLANT.

**MILBANK MANUFACTURING, CO.
KOKOMO FACILITY**

ACCIDENTAL SPILL PREVENTION PROGRAM (ASPP)

SPILL AND LEAK PREVENTION EQUIPMENT AND PROCEDURES

EQUIPMENT:

- (1) Sump for 5-stage cleaning system is protected by 2" minimum dam. All tanks have valved overflows to sump. Tanks 1 and 3 are double-valved to prevent leaks.
- (2) Clay absorbent material is used for spill containment.
- (3) Primary raw chemicals for cleaning system are stored in containment cabinets.

PROCEDURES:

In each department with stored hazardous chemicals, management and/or maintenance personnel visually inspect the storage areas for leaks prior to manufacturing operations.

Efforts are made to store chemicals in areas with minimal collision potential while maintaining good visibility.

Equipment with large volumes of chemicals (5-stage cleaning system) are visually inspected daily for leaks or spills. During cleanout operations, the cleaning system is visually inspected for mechanical or structural problems that could contribute to leaks or spills.

General employees who handle small amounts of chemicals in their routine work are encouraged to practice good housekeeping. Employees who transport or store large containers of chemicals are instructed in spill prevention as part of their job training.

EMERGENCY RESPONSE EQUIPMENT AND PROCEDURES

Equipment (Location)

- (1) Absorbent material (5-stage system and maintenance)
- (2) First aid equipment (First Aid room)
- (3) Eye wash stations (5-stage system)
- (4) Rubber gloves (5-stage system and maintenance)
- (5) Plastic drums for contaminated material storage (nearest trash drum with liner removed) and steel drums for combustible materials.
- (6) Splash aprons (5-stage system and maintenance)

Procedures:

Employees are instructed to notify their leadman or foreman immediately when they notice a spill or leak in their work area. The foremen inform maintenance and management personnel.

Maintenance and management personnel determine the severity of the spill or leak and necessary action required.

Substantial spills or leaks are handled as follows:

If necessary, employees are removed from the immediate area. If department or plant-wide evacuation is necessary, employees follow the procedures outlined in the Emergency Action Plan.

Power is removed from any equipment affected by the spill or leak.

Maintenance personnel attempt to control the leak or spill using appropriate protective equipment. Small spills are contained by absorbent material or portable dams. Spills or leaks from the 5-stage system are confined to the immediate work area and efforts made to pump remaining fluids into the holding tank.

Spilled material that is not contaminated is collected for reuse when possible. Small spills of contaminated material are collected into plastic drums and pre-treated if necessary. Combustible materials are collected into steel drums. Pre-treatment of acidic or basic materials consists of neutralization and solids separation or screening. Combustible materials are typically not pre-treated.

Disposal of contaminated materials is in accordance with state and local regulations. Outside contractors are utilized when appropriate.

SPILL REPORTING AND ASPP MODIFICATION PROCEDURES

The Kokomo Wastewater Treatment Plant (WWTP) is contacted by telephone in the event of a major spill to the city sewage system or to the outside plant premises. The Kokomo WWTP contact is currently Mitchell Smith at (765) 457-5509.

The ASPP is reviewed by plant management and maintenance personnel when procedures are found to be inadequate or changes in plant operation warrant modification. Modifications are made with the approval of Corporate management.

TRAINING PROCEDURES

General employees are encouraged to report spills immediately and follow good housekeeping practices. For safety purposes, they are generally not allowed to participate in major spill or leak containment efforts.

For employees that work in chemical storage and transport, spill prevention guidelines are included in their job training when hired.

Employees are informed of the chemical hazards in their immediate work area through the procedures as outlined in the Hazard Communication Program.

CERTIFICATION

I certify that the information provided in this document is to the best of my knowledge true and that the accidental spill prevention measures are implemented as described.


Name/Title

6-29-01
Date

**MILBANK MANUFACTURING CO.
KOKOMO FACILITY**

HAZARDOUS MATERIAL DATA

Hazardous Material	Location in Plant	Max. Vol. (gal)	Container Vol. (gal)	Container Type
Alkaline cleaner solution	5-stage system	3000	3000	closed vat
Iron phosphatizing solution	5-stage system	3000	3000	closed vat
Non-chromate sealer solution	5-stage system	(?)	(?)	closed vat
Diversy (product name)	5-stage system	(?)	55	steel drum
Diversy (product name)	5-stage system	(?)	55	steel drum

etc.

MILBANK

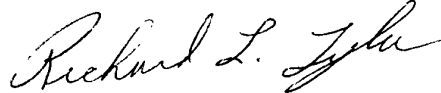
City of Kokomo
Wastewater Department
1501 W. Markland Avenue
Kokomo, IN 46901

To Whom It May Concern:

Based on my inquiry of the persons directly responsible for managing compliance with the pretreatment standard for total toxic organics (TTO), I certify that , to the best of my knowledge and belief, no dumping of concentrated toxic organics into the wastewater has occurred since filing the last Industrial Wastewater Pretreatment Monitoring Report. I further certify that this facility is implementing the solvent management plan submitted to the City.

Sincerely,

MILBANK MANUFACTURING CO.



Richard L. Tyler
Plant Manager

6-29-01

RLT:mew

MILBANK

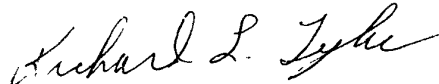
City of Kokomo
Wastewater Department
1501 W. Markland Avenue
Kokomo, IN 46901

To Whom It May Concern:

I certify under penalty of law that Milbank Manufacturing Company, Incorporated is in compliance with the categorical limits specified in 40 CFR 433.15 and set forth in Table 1 of Permit KWP-002. I further certify that this report and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate and complete. I am aware there are significant penalties for submitting false information, including the possibility of fines and imprisonment for knowing violations.

Sincerely,

MILBANK MANUFACTURING CO.



Richard L. Tyler
Plant Manager

RLT:mew

6-29-01

JUN 29 2001

TestAmerica

INCORPORATED

ANALYTICAL REPORT

Mr. Richard Tyler
MILBANK MANUFACTURING INC
1400 E. HAVENS ST.
KOKOMO, IN 56901-3188

06/21/2001

Job Number: 01.02993

Page 1 of 4

Enclosed are the Analytical Results for the following samples submitted to TestAmerica, Inc. Indianapolis Division for analysis:

Project Description: SEMI-ANNUAL WASTEWATER ANALYSIS

Sample Number	Sample Description	Date Taken	Time Taken	Date Received
295137	Semi-Annual - GRAB	06/07/2001	10:00	06/08/2001
295138	Semi-Annual - COMPOSITE	06/07/2001	15:30	06/08/2001

TestAmerica, Inc. certifies that the analytical results contained herein apply only to the specific samples analyzed.

TestAmerica Incorporated-Indianapolis Division is in compliance with the National Environmental Laboratory Accreditation Program (NELAP) Standards.

Reproduction of this analytical report is permitted only in its entirety.



Project Representative



ANALYTICAL REPORT

Mr. Richard Tyler
MILBANK MANUFACTURING INC
1400 E. HAVENS ST.
KOKOMO, IN 56901-3188

06/21/2001

Job No.: 01.02993

Page 2 of 4

Date Received: 06/08/2001

Job Description: SEMI-ANNUAL WASTEWATER ANALYSIS

Sample Number / Sample I.D.	Sample Date/	Analyst	Reporting
Parameters	Wet Wt. Result Flag Units	Date & Time Analyzed Method	Limit
295137	Semi-Annual - GRAB	06/07/2001 10:00	
Cyanide - Prep	Complete	rlm 06/12/2001 08:20	Complete
Cyanide, Total	<0.005 mg/L	cdk 06/14/2001 11:25 EPA 335.4	<0.005
Oil & Grease	<5. 1 mg/L	mhl 06/12/2001 13:00 EPA 1664A	<5.
Oil & Grease, Hydrocarbon	<5. 1 mg/L	mhl 06/12/2001 14:40 EPA-1664A	<5.
Phenol - Prep	Complete	rlm 06/11/2001 08:30	Complete
Phenol	<0.010 mg/L	cdk 06/13/2001 09:54 EPA 420.2	<0.010
295138	Semi-Annual - COMPOSITE	06/07/2001 15:30	
CBOD - Five Day	>26 z mg/L	rlm 06/13/2001 11:00 EPA 405.1	<5.
CBOD - Five Day (PREP)	Complete	rlm 06/08/2001 15:30 EPA 405.1	Complete
COD	700 d2x2 mg/L	tpd 06/11/2001 10:15 EPA 410.4	<100
Nitrogen, Ammonia Dist.	1.6 mg/L	cdk 06/18/2001 08:41 EPA 350.1	<0.10
Solids, Suspended	88 mg/L	mhl 06/13/2001 10:05 EPA 160.2	<5.
Distillation, Ammonia	Complete	rlm 06/15/2001 12:30	Complete
Cadmium, ICP	<0.005 mg/L	175 06/16/2001 14:13 EPA 200.7	<0.005
Chromium, ICP	<0.010 mg/L	175 06/16/2001 14:13 EPA 200.7	<0.010
Copper, ICP	0.048 mg/L	175 06/16/2001 14:13 EPA 200.7	<0.010
Lead, ICP	<0.005 mg/L	175 06/16/2001 14:13 EPA 200.7	<0.005
Molybdenum, ICP	<0.050 mg/L	175 06/16/2001 14:13 EPA 200.7	<0.050
Nickel, ICP	0.032 mg/L	175 06/16/2001 14:13 EPA 200.7	<0.010
Silver, ICP	<0.005 mg/L	175 06/16/2001 14:13 EPA 200.7	<0.005
Zinc, ICP	0.020 mg/L	175 06/16/2001 14:13 EPA 200.7	<0.020



PROJECT NARRATIVE

JOB NUMBER: 01.02993

SAMPLE: 295109

ANALYSIS: CBOD

The BOD value has been reported as a greater than value. The dilutions selected at the time of preparation were based upon historical sample dilutions. These dilutions were inappropriate for this particular sample due to higher than expected biological activity.

Due to the nature of the test, re-analysis could not be performed.

RLM 06-13-2001

TestAmerica

INCORPORATED

KEY TO ABBREVIATIONS

Page 4 of 4

<	Less than; when appearing in the result column, indicates analyte not detected at or above the Reporting Limit.
%	Percent; To convert ppm to %, divide result by 10,000. To convert % to ppm, multiply the result by 10,000.
*	Indicates the Reporting Limit is elevated due to insufficient sample volume.
mg/L	Part per million; Concentration in units of milligrams of analyte per Liter of aqueous sample.
ug/L	Part per billion; Concentration in units of micrograms of analyte per Liter of aqueous sample.
mg/kg	Part per million; Concentration in units of milligrams of analyte per kilogram of non-aqueous sample.
ug/kg	Part per billion; Concentration in units of micrograms of analyte per kilogram of non-aqueous sample.
a	Indicates the sample concentration was quantitated using a diesel fuel standard.
b	Indicates the analyte of interest was also found in the method blank.
c	Sample resembles unknown Hydrocarbon.
dw	When indicated, the result is reported on a dry weight basis. The contribution of the moisture content in the sample has been subtracted when calculating the concentration.
d1	Indicates the analyte has elevated Reporting Limit due to high concentration.
d2	Indicates the analyte has elevated Reporting Limit due to matrix.
e	Indicates the reported concentration is estimated.
g	Indicates the sample concentration was quantitated using a gasoline standard.
h	Indicates the sample was analyzed past recommended holding time.
i	Insufficient spike concentration due to high analyte concentration in the sample.
j	Indicates the reported concentration is below the Reporting Limit.
k	Indicates the sample concentration was quantitated using a kerosene standard.
l	Indicates an MS/MSD was not analyzed due to insufficient sample. An LCS / LCS Duplicate provided for precision.
m	Indicates the sample concentration was quantitated using a mineral spirits standard.
o	Indicates the sample concentration was quantitated using a motor oil standard.
p	Indicates the sample was post spiked due to sample matrix.
q	Indicates MS/MSD exceeded control limits. The associated sample may exhibit similar matrix bias. All other quality control indicators are in control.
r	Indicates the sample was received past recommended holding time.
u	Indicates the sample was received improperly preserved and/or improperly contained.
uj	Indicates the result is below the Reporting Limit and is considered estimated.
x	Indicates the BOD dilution water blank depletion was between 0.2 and 0.5 mg/L.

DATE: Nov 7th, 2001

MILBANK MANUFACTURING COMPANY

BEGINNING READING @ 7:00 AM 287500

TIME	METER READING	INITIAL
7:30	287700	SLH
8:00	287890	SLH
8:30	288080	SLH
9:00	288260	SLH
9:30	288420	SLH
10:00	288600	SLH
10:30	288790	SLH
11:00	288980	SLH
11:30	289150	SLH
12:00	289330	SLH
12:30	289530	SLH
1:00	289720	SLH
1:30	289910	SLH
2:00	290100	SLH
2:30	290290	SLH
3:00	290470	SLH
3:30	290620	SLH

Took the Grab Samples at the 12:00 Reading

REGULATED PARAMETERS (6)	Local Discharge Limitations (7)		Monitoring Requirements	
	Daily Maximum (mg / L)	Monthly Average (mg / L)	Frequency	Sample Type
Cadmium (5)	0.02	0.015	Semi-Annual	Composite (2)
Total Chromium (5)	2.0	1.2	Semi-Annual	Composite (2)
Copper (5)	0.6	0.4	Semi-Annual	Composite (2)
Cyanide (5)	0.5	0.3	Semi-Annual	Grab
Lead (5)	0.1	0.06	Semi-Annual	Composite (2)
Nickel (5)	0.8	0.5	Semi-Annual	Composite (2)
Silver (5)	0.24	0.15	Semi-Annual	Composite (2)
Zinc (5)	1.25	0.75	1 X Month	Composite (2)
Molybdenum (5)	Monitor and Report		1 X Month	Composite (2)
PH	6-10 (Std. Units)	-----	Daily	Grab
CBOD ₅ (4)	Monitor and Report		1 X Month	Composite (2)
COD (4)	Monitor and Report		1 X Month	Composite (2)
TSS (4)	Monitor and Report		1 X Month	Composite (2)
Ammonia-N (4)	Monitor and Report		1 X Month	Composite (2)
TPH	Monitor and Report		Semi-Annual	Grab
Oil, Grease (3)	100	-----	Semi-Annual	Grab
Flow	-----	-----	Daily (3)	
TTO	2.13	-----	Semi-Annual	Grab
Phenol	0.50	-----	Semi-Annual	Grab

DATE: June 14, 2001

PLEASE TEST FOR THE FOLLOWING ITEMS
HIGHLIGHTED ABOVE.....

REGULATED PARAMETERS (6)	Local Discharge Limitations (7)		Results	Date Taken	Monitoring Requirements	
	Daily Maximum (mg / L)	Monthly Average (mg / L)			Frequency	Sample Type
Cadmium (5) (CD)	0.02	0.015	<0.005	6-7-01	Semi-Annual	Composite {2}
Total Chromium (5) (CR)	2.0	1.2	<0.010	6-7-01	Semi-Annual	Composite {2}
Copper (5) (CU)	0.6	0.4	0.048	6-7-01	Semi-Annual	Composite {2}
Cyanide (5) (CA)	0.5	0.3	<0.005	6-7-01	Semi-Annual	Grab
Lead (5) (PB)	0.1	0.06	<0.005	6-7-01	Semi-Annual	Composite {2}
Nickel (5) (NI)	0.8	0.5	0.032	6-7-01	Semi-Annual	Composite {2}
Silver (5) (AG)	0.24	0.15	<0.005	6-7-01	Semi-Annual	Composite {2}
Zinc (5) (ZN)	1.25	0.75	0.020	6-7-01	1 X Month	Composite {2}
Molybdenum (5) (MO)	Monitor and Report		<0.056	6-7-01	1 X Month	Composite {2}
PH	6-10 (Std. Units)	-----			Daily	Grab
CBOD (4)	Monitor and Report		726	6-7-01	1 X Month	Composite {2}
COD (4)	Monitor and Report		700	6-7-01	1 X Month	Composite {2}
TSS (4)	Monitor and Report		88	6-7-01	1 X Month	Composite {2}
Ammonia-N (4) (NH3)	Monitor and Report		1.6	6-7-01	1 X Month	Composite {2}
TPH (Oil & Grease Hydrocarbons)	Monitor and Report		<5	6-7-01	Semi-Annual	Grab
Fats, Oils & Grease (8) (FOG)	100	-----	<5	6-7-01	Semi-Annual	Grab
Flow	-----	-----			Daily (3)	
TTO	2.13	-----			Semi-Annual	Grab
Phenol	0.50	-----	<0.010	6-7-01	Semi-Annual	Grab

* The above listed discharge limitations and monitoring requirements are minimum requirements necessary to achieve compliance. Nothing in the permit shall prevent MMCI from exceeding the requirements of this table.

Per telephone conversation with Ronda Huffer 6-29.
we do not need to retest for CBOD's the reading
is still under 80 we have never had a problem
before.